

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

**DECLARATION OF**  
**TERRENCE M. CONNORS**

v.

Civil Action No. 24-CV-40-EAW-MJR

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.  
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TERRENCE M. CONNORS, ESQ., declares pursuant to 28 U.S.C. § 1746  
under penalty of perjury that the following are true and correct:

1. I am an attorney duly licensed to practice in the State of New York and the United States District Court for the Western District of New York and a partner in the law firm Connors LLP, counsel for the Defendants, ROYAL LEGAL GROUP LLC (“Royal”) and HAILSTONE LEGAL GROUP LLC (“Hailstone”), in the above-captioned action. Therefore, I have knowledge of the facts set forth in this declaration.

2. I submit this declaration in support of Royal’s and Hailstone’s motion to modify the preliminary injunction as to them and provide instructions to the Receiver accordingly.

3. During a settlement conference in this matter in June, 2024, I raised with this Court and the Receiver the issues that are the subject of Royal's and Hailstone's motion, i.e., that neither firm should be subject to the preliminary injunction because they do not charge — and never have charged — advance fees.

4. Both this Court and the Receiver directed me to take Royal's and Hailstone's concerns to the Government to seek relief; the Receiver was not opposed.

5. When I then broached the topic with attorneys for the Government, they indicated that any relief for Royal or Hailstone would be improper because "the case was stayed" at the time.

6. After this Court's stay was lifted, I again contacted attorneys for the Government concerning relief from the preliminary injunction for Royal and Hailstone.

7. During this second attempt, I was advised by the Government that they did not trust Royal and Hailstone to operate a lawful business and that any motion seeking relief from the protective order for Royal and Hailstone would be opposed.

8. Since this did not appear to be a valid reason to deny the relief I sought for Royal and Hailstone, I now petition this Court.

WHEREFORE, the Defendants ROYAL LEGAL GROUP LLC and HAILSTONE LEGAL GROUP LLC respectfully request that this Court grant their

motion to modify the preliminary injunction as to them and provide instructions to the Receiver accordingly.

Dated: Buffalo, New York  
October 17, 2024

/s/ Terrence M. Connors